

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NO. CASE NO. CR 18-577 CRB
Plaintiff,) STIPULATION REGARDING BUSINESS
v.) RECORDS OF ROYAL BANK OF SCOTLAND
MICHAEL RICHARD LYNCH and)
STEPHEN KEITH CHAMBERLAIN,)
Defendants.)

The United States and Defendants Michael Richard Lynch and Stephen Keith Chamberlain hereby stipulate that the following documents are (1) business records pursuant to Federal Rule of Evidence 803(6) because they were made at or near the time by someone with knowledge; kept in the course of regularly conducted business; and made as part of a regular business activity; and (2) are authentic pursuant to Federal Rule of Evidence 901, 902(11), 902(13), and/or 902(14).

Exhibit	Description	Custodian
11997	Royal Bank of Scotland Group	RBS
11998	Royal Bank of Scotland Group, Account Transaction	RBS

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3 DATED: March 14, 2024

Respectfully submitted,

4 PATRICK D. ROBBINS
5 Attorney for the United States,
6 Acting Under Authority Conferred by
7 28 U.S.C. § 515

/s/

8
9 ROBERT S. LEACH
10 ADAM A. REEVES
11 KRISTINA N. GREEN
12 ZACHARY G.F. ABRAHAMSON
13 Assistant United States Attorneys

14 DATED: March 14, 2024

CLIFFORD CHANCE US LLP

/s/

15 CHRISTOPHER J. MORVILLO
16 Attorneys for Defendant Michael Lynch

17 DATED: March 14, 2024

BIRD, MARELLA, BOXER, WOLPERT,
18 NESSIM, DROOKS, LINCENBERG, &
19 RHOW, P.C.

/s/

20 GARY S. LINCENBERG
21 Attorneys for Defendant Stephen
22 Chamberlain